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**From:** Kerianne Kavanaugh [kkavanaugh@ashcraftlaw.com]  
**Sent:** Thursday, June 20, 2013 11:51 AM  
**To:** Kerianne Kavanaugh  
**Subject:** FW: West Explosion Protocol

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**From:** John McCoy [<mailto:jmccoy@mllaw.com>]  
**Sent:** Wednesday, June 19, 2013 3:41 PM  
**To:** 'Regina Valenti'; 'mrosek@millaw.com'; 'chuckk@craneengineering.com'; 'mattw@craneengineering.com'  
**Cc:** West Explosion Attorneys; Matt Rosek; 'Hayes Fuller'  
**Subject:** RE: West Explosion Protocol

All,

We are going to issue the Crane protocol for next week.

Much of your concerns will be dealt with and resolved in real time at the site during the removal of the debris pile.

Our goal is to have 2 representatives per party. It may be hard to enforce.

As to cost of storage for items that the group does not want but one party or a small contingent of parties want to retain...that will be addressed as needed. I anticipate that if we are confronted with this issue we will defer the cost issue to a later date for the courts to decide. I believe that if a party wants an item that all others believe has no value then they should be willing to bear the cost of retaining that item. But I will not make that decision. I will defer to the court, if that becomes an issue.

I look forward to meeting you next week.

John

John V. McCoy



9452488

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**From:** Regina Valenti [<mailto:Rvalenti@hhklawfirm.com>]

**Sent:** Wednesday, June 19, 2013 1:43 PM

**To:** John McCoy; 'mrosek@millaw.com'; 'chuckk@craneengineering.com'; 'mattw@craneengineering.com'

**Cc:** West Explosion Attorneys

**Subject:** West Explosion Protocol

From Michelle Parfitt:

Enclosed please find the edits to the June 24 walk through draft protocol. Please advise if you have any questions.

**Regina L. Valenti**

Senior Trial Paralegal

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